Dear Ron,

Congratulations on initiating this NEPA analysis for the South Otter Project particularly given limited district resources and fierce competition for project analysis funds on the Custer Gallatin National Forest. Clearly this is an important opportunity and a significant investment to consider the most important ecological needs of the area particularly considering the significant fires that have occurred over the past 20 years. With that a holistic approach to addressing issues that are contributing to challenges in restoration and resiliency such as addressing the grossly degraded and now dysfunctional existing road and motorized trail systems, taking action on marginalized riparian area, responding to and mitigating the abundance of pioneered travel-ways and initiating transactional wildlife habitat improvement that moves habitat forward and not as a consequence of forested and non-forested vegetative manipulation and removal are in order (or, alternatively, be clear and modify or change the project name).

Ron, it is vitally important that the basis of this analysis, the purpose and need, is the result of honest, verifiable, compelling and realistic evaluation. Any proposed outcomes from the purpose and need should result in implementable projects considering the extraordinary dynamic ecosystem of the South Otter area… and not what may be a proposal to meet the fulfillment of Regional Office quotas or directives. Unfortunately this proposal reads like a canned regurgitation of the same old same old without much site specific or honest evaluation of *this* ecosystem – as is, this proposal could be slapped on to the Bitterroot National Forest or some other area (that actually has merchantable timber) and read just the same... restoration and resiliency in the guise of providing wood products to contribute to employment and industry in local communities.  *As is the stated purpose and need is questionable as to its validity and more importantly, bordering on dishonest.*

With this ambitious undertaking, I am also challenged to comprehend the enormity of the project both in geographic scope, types of vegetative treatments, timeframe and the consequences and the connected actions of it all. Further the delivery of this proposal to the public with no interactive discussion or presentation is not acceptable. *The presentation of this enormous and complex project requires interactive communication and cannot simply rely on a letter with maps (for those who have internet in this vastly underserved area).*

In terms of process, on page 10 of the South Otter Request for Comments, comes mention that this decision would be implemented over a 20 year period. Did I miss this nuance somewhere else earlier in the proposal? This has significant and consequential ramifications in terms of disclosure – I am at a loss to understand how site specific analysis and potential effects could be described for implementation 20 years from now. The over-arching Custer Gallatin Forest Plan which this analysis is tiered to is only intended to have a 20 year duration. But more importantly – why, what is the purpose of trying to imagine conditions 20 years from now? While some treatments such as tree planting and pre-commercial thinning, could be proposed, defined and implemented via a short analysis document such as this one for a 20 year period, I strongly object to the promotion that an analysis such as this could or should in any way provide the efficacy necessary to support implementation of non-commercial and commercial timber treatments as well as prescribed fire for a 20 year period. This is not what NEPA intended.

Given the immense 293,500 acre project area, the very fluid and dynamic fire regime on the Ashland Ranger District, the proposed multiple ongoing treatment scenarios based on a yet not finalized Custer Gallatin Forest Plan, you ask the impossible; comprehension of a proposal that reads and at the scale of a “watershed analysis” but with site specific and time specific NEPA implementation over a 20 year time period. *I request that you reconsider this aspect of the proposal and reframe to a maximum 10 year decision implementation period for all treatments excluding commercial timber treatments which should be considered in a separate environmental analysis by geographic settings (such as delineated in the South Otter Prescribed Fire and Timber Stand Improvement Treatment Opportunities.*

I want to address a few points in the Purpose and Need, portions of the Existing Condition, the Desired Condition, the Proposed Action, and Transportation sections of the South Otter Landscape Restoration and Resiliency Project request for comment.

Purpose and Need

The Purpose and Need states:

1. The purpose and need for the South Otter project is to improve forest resiliency in ponderosa pine forested areas, provide for biological and structural diversity, reduce the risk of largescale catastrophic wildfire, and reduce fuel loads in existing forested stands. The purpose and need are also to improve or maintain wildlife habitat, refresh native grasslands and forested areas that are structurally diverse, and to provide for local jobs, services and products.

1.a The South Otter Project should take a holistic approach and consider all the issues and challenges in forested and non-forested lands to improve resiliency. Reducing the risk of largescale catastrophic wildlifires in the project area should only be considered around values at risk specifically and exclusively, private property adjacent to the Forest. Since most, if not all of the largescale catastrophic wildfires in this area have been wind driven, please provide a definitive explanation as to how and under what circumstances ever, has a large wildfire been reduced, minimized, or intensity abated on the Ashland Ranger District by timber treatments in ponderosa pine areas. I am unfamiliar with the meaning of refresh native grasslands and forested areas. Please explain the intent or proposed treatment.

1. Restore ponderosa pine ecosystems towards a more heterogeneous forested landscape with a diverse age and size structure (including old growth), understory structure and composition, patch size, and patterns that are resilient to natural disturbances such as fire, insects and disease, and climate change. Promote ponderosa pine forest health to increase and maintain the presence of large trees. Within the project area, initiate change of the fire regime from low-frequency, high intensity towards one of higher-frequency and lower intensity. Lessen the potential spatial extent and intensity of disturbances (such as high intensity wildfire and high mortality from beetles). Reduce fuel loads to enhance fire suppression capabilities by modifying fire behavior.

2.a Most of the ponderosa pine ecosystem has been removed by large wildfires over the past 20 plus years in the project area. What remains are disjointed small pine islands as displayed on the treatment maps. It would appear that the existing condition is heterogeneous and diverse with if anything a significant lack of new ponderosa pine forests that could be dealt with by thoughtful and appropriately spaced planting. Please show cause and provide the data where there is or has been a problem with insects such as pine beetles and subsequent tree mortality or disease in the project area and Ashland Ranger District to support your conclusions about insects and disease.

1. Use the values at risk identified in the Powder River Wildfire Protection Plan (PRWPP, 2016) and the Rosebud County Community Fire Plan to help in the planning of vegetation management treatments on National Forest System lands. Provide wood products to contribute to employment and industry in local communities and help support the sustainable supply of timber from National Forest System lands.

3.a Values at risk should only be identified as private property within a WUI and directly adjacent to the National Forest for treatments where landowners are in agreement to proposed actions.

1. Manage to maintain or improve long-term diversity and quality of wildlife habitat and selected species. Provide habitat diversity, including habitats associated with standing snags, down wood, non-forested grasslands, shrub-lands, and deciduous woodlands and meet key wildlife habitat characteristics for big game and other selected species.

4.a I could not find any specific wildlife habitat improvement projects in this project. I am challenged to think how additional manipulation of the project area, specifically any commercial timber treatments along with the hundreds of miles of “improved roads and motorized trails” would be anything but detrimental to key wildlife species and their habitat. Significant large portions of the project areas have been decimated by stand replacing fires over the past 20 years and it is unfathomable to square this with this proposal.

1. The proposed vegetative treatments would provide for a wildfire resilient landscape to reduce the effects of large-scale wildland fires that have occurred within and adjacent to this landscape in recent times. The expected result of this project is to maintain vegetative conditions that welcome frequent low intensity fire events rather than high intensity stand replacing events on the landscape.

5.a See comments from 1-4 above. There are certainly some areas in the project where years of repeated prescribed fire have resulted in an environment that would “welcome” frequent low intensity fire events but that isn’t the reality on most of the landscape within the project area and the Forest Service does not have the money or organization to make it so.

1. This project would also be a future economic driver for local and adjacent communities by providing product to the local and regional sawmills and forest product manufacturers with potential to provide job opportunities to local communities and the Northern Cheyenne Tribe.

*6.a This statement is absurd and an embarrassing if not gratuitous and misleading deception of job opportunities for the Northern Cheyenne Tribe as well as “local” and adjacent communities. Yes, one or two local dirt contractors have significant opportunities to contract with the FS/BLM for prescribed burn projects and fire but aside from that, pre-commercial thinning and tree planting have been provided by contracts typically from Oregon. While there have been small, simplistic roadside timber sales that followed the 2012 Ash Creek Fire, I am not aware of a timber sale sold and completed on the Ashland Ranger District for over 20 years… however there have been innumerable expensive analyses that never went anywhere due to lack of market interest, litigation or the project was burnt up. The closest sawmills located in Hulett Wyoming and the Black Hills of South Dakota I believe have not bid or completed a timber sale on the Ashland Ranger District for over 20 years. Typically, interest was only sustained when significant portions of the road package and other attributes of the sale packaged were removed and assigned to the FS at their expense. The timber yard in Ashland has been shut down for the past 2 years and for 20 years before that. Even so, for the few years it was open, capacity was severly limited and ability to take on large projects questionable.*

*Please provide the economic analysis and history over the past 20 plus years to qualify this statement. What drives the economy of the area around the Ashland Ranger District is agriculture - is the district still not the largest permitted livestock unit in the Forest Service?*

Existing Condition

There are aspects of this section that would be more appropriate to tree farming. As stated earlier in this response, please show data for high insect hazard levels and the address the overall relevance of this if there is any within the project area and within the Ashland Ranger District.

Desired Condition

This section is not at all helpful or understandable to the average citizen and certainly further confusing considering the lack of communication on the project. There is no way to equate how these conditions relate to each other or the intent within the project area.

Proposed Action

As stated earlier in this response, the Purpose and Need is not actionable nor is it factual. The scope and scale of this project is too large, complex, long, and undetermined in so as to result in free license to the Forest Service for the next 20 years to have a vegetative free-for-all. And in doing so grossly increase the road and motorized trail system in an area that is already heavily over utilized and without meeting site specific NEPA requirements or disclosure.

I oppose all of the proposed Commercial Timber treatments described in this proposal as written. Any timber treatments should be consider by area designation depicted in the Timber Stand Improvement Treatment Opportunities map and analyzed in a separate and site specific NEPA document. These treatment proposals are too vague and their consequences not understandable or comprehensible in the chosen format of this analysis. Look at the South Otter Fire History Map, 1985 to present; why would one remotely consider removing the last straggling timber stands in the project area – the purpose and need does not hold water for these proposed treatments. Any big game hunter who enjoys hunting in the project area knows both deer and elk are found in these remaining timber pockets as all the other cover has been eliminated from numerous stand replacing large scale wildfires.

I agree with the proposed Pre-commercial Thinning proposed for this project and support vastly higher acres per year. It is truly unfortunate that thinning was not widely used on the Ashland Ranger District over the past 20 years given the fire regime.

I agree with tree planting in patches and mosaic patterns that imitate natural regeneration. Thoughtful spacing, not the policy or handbook directive, is essential considering frequent wildland fires. That said, the interaction with prescribed fire needs to be cleverly thought out as the planting investment will generally preclude prescribed fire opportunities and strategies.

I agree with proposed prescribed fire in general but not for a 20 year implementation period or 293,000 acres. A prioritized project lists along with typical project specifics would help to understand the most compelling need and intentions in the project area.

Transportation

F.S. roads v.s. motorized trails… 296 miles of improved motorized trails to a standard suitable for and designed to provide Commercial Timber extraction. No. Improving these travelways from their current no level of maintenance to a road level of maintenance (disguised as a coincident administrative use) is beyond the scope of this project and is a significant action. By removing the commercial timber treatments in this proposal and addressing in a separate NEPA analysis by areas delineated in the Presribed Fire and Timber Stand Improvement Map these disclosures and the miles of what will appear as new roads can be disclosed to the public. Relative to temporary roads, there’s no such thing as the Forest Service does not have the money or the where with all to effectively decommission temporary roads. This project area with its soil and topography are not suitable for such and would be extremely susceptible to the long term detrimental effects of so called temporary roads. Further expenditures to develop temporary roads and the improvement of motorized trails would be better used to maintain the existing approved road system which is frankly disgraceful.

As I conclude my comments I want to reiterate a need for better public communication for this project on-line or whatever, I think you can devise something that meets covid restrictions. The project is too complicated to pretend reading an online project proposal with large detailed maps and long tables of proposed activities will suffice. A 20 year implementation schedule by a decision on this document does not meet NEPA requirements. Proposed commercial timber harvest should be removed from this analysis and addressed in smaller geographic areas where effects can be displayed, evaluated and understood. Changing motorized trails to “coincident administrative routes” is a significant action that changes the decision in the Ashland District Travel Plan and is beyond the scope of this proposal.

I look forward to staying involved in this proposal.

Liz McFarland